

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF
EDUCATORS, BARBARA PHILLIPS,
JAMES THOMAS, DAWN ZIMMERER,
L.E. JIBOL, UNITED CAMPUS
WORKERS SOUTHEAST LOCAL 3821,
MADISYN DONLEY, ALEXIS COBBS,
KAREN ADERER, FOSTERING
LGBTQ+ ADVOCACY, RESOURCES,
ENVIRONMENTS AND WOMEN IN
SCIENCE AND ENGINEERING,

Plaintiffs,
v.

Civil No. 3:25-cv-417-HTW-LGI

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER
LEARNING, MISSISSIPPI COMMUNITY
COLLEGE BOARD, MISSISSIPPI STATE
BOARD OF EDUCATION, MISSISSIPPI
CHARTER SCHOOL AUTHORIZER
BOARD,

Defendants.

SECOND SUPPLEMENTAL DECLARATION OF JAMES M. THOMAS

I, JAMES M. THOMAS, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of eighteen and competent to make this declaration. I submit this declaration based on my personal knowledge.
2. I am a parent to two children who are in the 5th grade and 9th grade in the Oxford School District, in Oxford, Mississippi.
3. As a parent, I am concerned that the challenged provisions will prevent my children from learning accurate and complete history and context about their state and their country. I am also concerned the challenged provisions will prevent my children from speaking about and being able to hear others speak about banned topics within classroom and school settings. Moreover, I believe the challenged provisions will restrict

my children's opportunities to engage in meaningful discussion and enrichment on banned topics within extracurricular activities, and will encourage self-censoring among students, teachers, and staff. This will limit my children's capacity to reach their full educational potential while enrolled in public schools and will deny their constitutional right to learn about those subjects.

4. I believe that my children and other children may be reprimanded or punished for speaking about banned topics, for asking questions related to banned topics, and even for making comments in passing about banned topics even though these topics have been part of their curriculum and learning within the Oxford School District for the entirety of their educational journey, as well as for all public school children throughout Mississippi and the rest of the country.

5. I am concerned as a parent that the vague, ambiguous, and inconsistent provisions within HB1193 will make it difficult for my children and me to differentiate between what is allowed and what is not, and therefore put my children at constant risk and fear of violating these challenged provisions themselves, or fear for their teachers and peers who might violate these challenged provisions.

6. If any of the Oxford schools incurs a violation and later a second uncured violation, it might lead to all state funds being withheld from the entire school district. This loss of funding might mean that my children's schools could close, and they would be sent home from school. This would place a serious burden on me and all other parents in our district who work or have other commitments during the school day.

7. I am concerned as a parent for what HB1193 does to limit my children's future opportunities when they graduate from public school in Mississippi. If they are unable to learn about topics in their schools that children in other public schools can study freely and without restriction, then my children will be disadvantaged when they enroll in a higher education program. They will lack the knowledge and understanding of our state's and nation's history and context necessary for succeeding in higher education.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 1st day of August, 2025, in Oxford, Mississippi.

A handwritten signature in cursive script that reads "James M. Thomas". The signature is written in dark ink on a light gray rectangular background.

James M. Thomas
Parent of two children in the Oxford School District
Oxford, Mississippi